

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
FRONTIER COMMUNICATIONS) Chapter 11
CORPORATION, *et al.*¹) Case No. 20-22476-mg
) (Jointly Administered)
)
)

**JOINT STIPULATION AND ORDER BETWEEN MOVIE COMPANY CLAIMANTS
BLACK BUTTERFLY FILM, LLC; AMBI DISTRIBUTION CORP.; DUBIOUS
PRODUCTIONS, INC.; RUPTURE CAL, INC. AND DEBTOR**

1. WHEREAS, on April 14, 2020, Frontier and certain of its direct and indirect subsidiaries and affiliates (collectively, “Debtors”) voluntarily filed petitions under Chapter 11 of the United States Bankruptcy Code in the Southern District of New York, jointly administered under Case No. 20-22476 (the “Bankruptcy Case”);
2. WHEREAS, on August 21, 2020 Debtors filed their *Fifth Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [ECF No. 984] (the “Plan”) in the Bankruptcy Case;
3. WHEREAS, on August 27, 2020, the Bankruptcy Court entered an Order in the Bankruptcy Case confirming the Plan;
4. WHEREAS, on September 21, 2020, Black Butterfly Film, LLC filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$179167 based on *inter alia* theories of secondary copyright infringement with respect to one movie – *Black Butterfly* (the “Black Butterfly Work”) [Claim No. 2853] (the “Black Butterfly Claim”);

¹ Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.primeclerk.com/ftr>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

5. WHEREAS, on September 22, 2020, AMBI Distribution Corp. filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$179,167 based on theories of secondary copyright infringement with respect to one movie – *2047 Sights of Death* (the “2047 Work”) [Claim No. 2858] (the “2047 Claim”);

6. WHEREAS, on September 22, 2020, Dubious Productions, Inc. filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$179,167 based on theories of secondary copyright infringement with respect to one movie – *In Dubious Battle* (the “Dubious Work”) [Claim No. 2865] (the “Dubious Claim”);

7. WHEREAS, on September 22, 2020, Rupture CAL, Inc. filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$179,167 based on theories of secondary copyright infringement with respect to one movie – *Rupture* (the “Rupture Work”) [Claim No. 2901] (the “Rupture Claim”);

8. WHEREAS, on April 30, 2021, the Effective Date of the Plan occurred, and the Plan was consummated; and

9. WHEREAS, pursuant to Fed. R. Bankr. P. 7041 and Fed. R. Civ. P. 41(a)(1)(A)(ii) and/or 41(a)(2), Black Butterfly Film, LLC; AMBI Distribution Corp.; Dubious Productions, Inc.; Rupture CAL, Inc. and Debtors (collectively, “Parties”) stipulate to the dismissal of the Black Butterfly Claim, 2047 Claim, Dubious Claim and Rupture Claim and all known and unknown claims between the Parties with prejudice, with each Party to bear its own costs and attorneys’ fees. In the interest of clarity, the parties further stipulate that no Party will seek recovery of costs or attorneys’ fees against the other incurred in this contested proceeding.

DATED: New York, New York
May 2, 2025

/s/ Kerry S. Culpepper
Kerry S. Culpepper

/s/ Stanley A. Twardy, Jr. (with authorization)
Stanley A. Twardy, Jr.

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SO ORDERED:

Dated: New York, New York
May __, 2025

Chief Judge Martin Glenn
United States Bankruptcy Judge